

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION**  
Civil Action No. 1:11-cv-0129

JIHUI ZHANG,

Plaintiff,

v.

FEDERATION OF STATE MEDICAL  
BOARDS, NATIONAL BOARD OF  
MEDICAL EXAMINERS, and  
PROMETRIC,

Defendants.

**MOTION FOR EXTENSION OF  
TIME**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant Federation of State Medical Boards (“FSMB”) moves the Court for an order extending its time to answer or otherwise respond to Plaintiff’s Complaint in the above-referenced action to and including April 20, 2011. In support of its motion, and as good cause, FSMB shows the Court the following:

1. This *pro se* action was filed on or about February 18, 2011.
2. FSMB was served with a copy of a Summons and Complaint on February 28, 2011.
3. The time to answer or otherwise respond has not expired, no prior extensions of time have been obtained, and FSMB’s counsel requires additional time within which to investigate this matter and prepare a responsive pleading.
4. This Motion is made in good faith and not for the purpose of delay.

WHEREFORE, Defendant Federation of State Medical Boards respectfully requests an extension of time through and including April 20, 2011, in which to file its response to Plaintiff's Complaint.

This the 17<sup>th</sup> day of March, 2011.

/s/Jon Berkelhammer

Jon Berkelhammer

NC Bar No. 10246

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*Attorney for Defendants Federation of State  
Medical Boards and National Board of  
Medical Examiners*

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 17, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

[rphillips@brookspierce.com](mailto:rphillips@brookspierce.com)  
[bnorman@brookspierce.com](mailto:bnorman@brookspierce.com)

and I hereby certify that I have mailed the document to the following non CM/ECF participant:

**JIHUI ZHANG**  
102 ROWE ROAD  
CHAPEL HILL, NC 27516

/s/Jon Berkelhammer  
Jon Berkelhammer  
*Attorney for Defendants Federation of State  
Medical Boards and National Board of  
Medical Examiners*